



August 15, 2017

Assembly Member Rob Bonta
State Capitol, Room 2204
Sacramento, CA 95814

Assembly Member Miquel Santiago
State Capitol, PO Box 942849
Sacramento, CA 94249

Assembly Member Adrin Nazarian
Capitol Office, PO Box 942849
Sacramento, CA 94249

RE: AB 1479 (Bonta) – Public Records: Civil Penalties – OPPOSE UNLESS AMENDED

Dear Assembly Members:

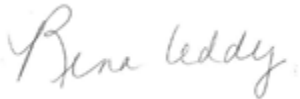
On behalf of the LA Fashion District Business Improvement District (BID) representing 945 property owners and 4000+ businesses in downtown Los Angeles, I am writing to express our opposition to Assembly Bill 1479, unless amended. The bill would place additional burdens on private non-profit organizations that adhere to the California Public Records Act ("CPRA"). We appreciate the amendments to the bill on July 11 in the Senate Judiciary Committee, but feel additional amendments are needed to protect non-profit, community-based organizations who remain vulnerable to abuse of the CPRA.

The CPRA already provides legal remedies to requestors who feel there have been obstacles. The responsibility of fulfilling these requests often falls on small teams that are stretched to their limits. The Fashion District BID is required by law to respond to all CPRA requests but there must also be recognition of the significant burden these requests have, in particular serial abuse of the CPRA. In the past 18 months, we have had one individual, with the intent to bring our organization – and all BIDs—to its demise, who has submitted 100 requests. Our non-profit has an administrative staff of 4 people and we have worked in good faith to respond to the records in a timely manner. In order to comply, we've also retained a specialized attorney to navigate the complexities of the CPRA law. We are not the only BID that has received hundreds of requests from this one individual. Many of these BIDs have very small budgets, some with only a volunteer or part-time administrator. Creating a new incentive with a civil penalty provision would create a real economic

incentive for those that abuse CPRA to seek not only the penalty, but to also seek attorney's fees and court costs.

The Fashion District BID fully supports transparency within local government. However, we believe it is critical to clarify that as it is written today, AB 1479 will unfairly impact private non-profit organizations. We ask that AB 1479 be amended to restrict its application only to public (governmental) agencies. We look forward to continued conversations with you and your staff to help us address our concerns.

Sincerely,

A handwritten signature in cursive script that reads "Rena Leddy".

Rena Leddy
Executive Director